

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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PHOENIX BULK CARRIERS (BVI), LTD,	)	Civil Action No
	)	1:20-CV-00936-JGK
Petitioner,	)	
	)	
v.	)	<b>NOTICE OF JOINT MOTION</b>
	)	<b>TO QUASH SUBPOENAS</b>
	)	
TRIORIENT, LLC	)	
	)	
Respondent	)	
	)	

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**PLEASE TAKE NOTICE** that upon the affirmation of James M. Moriarty dated December 2, 2020 and the accompanying Memorandum of Law in Support of Joint Motion to Quash, non-parties Albert Winslow and Juan Facundo Santucci (collectively, the “Non-Parties”) will move this Court, pursuant to Fed. R. Civ. P. 45(d)(3), at Courtroom 21A, United States Courthouse, 500 Pearl Street, New York, New York 10007, at a date and time to be established by this Court (if it directs oral argument to be had), or at the conclusion of the submission of motion papers, for an Order quashing the subpoenas served on Brooklawn Country Club, seeking private financial records and other personal documents related to Mr. Winslow, and Manursing Island Club, seeking private financial records and other personal documents related to Mr. Santucci, (collectively the “Country Clubs”), by Phoenix Bulk Carriers (BVI) Ltd.

**PLEASE TAKE FURTHER NOTICE** that pursuant to Local Civil Rule 6.1(a), opposing papers are required to be served within seven (7) days after service of the moving papers, and reply papers are required to be served within two (2) days after service of the answering papers.

Dated: Bridgeport, Connecticut  
December 2, 2020

ZEISLER & ZEISLER, P.C.  
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